

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

U.S. COMMODITY FUTURES TRADING
COMMISSION, et al. §
Plaintiffs, §
v. §
CIVIL ACTION NO.
3:20-CV-2910-L
TMTE, INC. a/k/a METALS.COM, CHASE
METALS, INC., CHASE METALS, LLC,
BARRICK CAPITAL, INC., LUCAS THOMAS
ERB a/k/a LUCAS ASHER a/k/a LUKE ASHER,
and SIMON BATASHVILI,
Defendants,
TOWER EQUITY, LLC,
Relief Defendant.

**APPENDIX IN SUPPORT OF RECEIVER'S
FIFTH FEE APPLICATION**

Kelly M. Crawford, as the Court appointed Receiver, submits the following Appendix in Support of the Receiver's Fifth Fee Application, as follows:

- | | | |
|------------------|---|----------------|
| Exhibit A | Invoices of Receiver's time and expense | pages 3 to 10 |
| Exhibit B | Invoices of Scheef & Stone | pages 11 to 35 |
| Exhibit C | Invoices of Brown Fox, PLLC | pages 36 to 38 |
| Exhibit D | Declaration of Receiver Kelly Crawford | pages 39 to 40 |

Dated: September 22, 2021

Respectfully submitted,

SCHEEF & STONE, L.L.P.

By: /s/ Peter Lewis

Peter Lewis
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**ATTORNEYS FOR RECEIVER
KELLY M. CRAWFORD**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 22, 2021, I electronically filed the foregoing document with the clerk of the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the court, which provided a "Notice of Electronic Filing" to all attorneys of record.

/s/ Peter Lewis
PETER LEWIS

Scheef & Stone, L.L.P.
500 N. Akard, Suite 2700
Dallas, Texas 75201



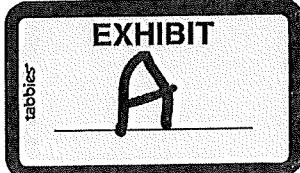
INVOICE

Kelly Crawford Receivership – Metals.co

Statement Date: 06/25/2021
Account No. 16125.101
Invoice No. 1023241

Matter 101 - Receiver

		Hours
05/26/2021	KMC Receive email from A. Spencer regarding deposits into receivership account and respond regarding status of complying with the court orders (.25); receive and review email from counsel for Carlos Cruz and MagicStar Arrow and conference with P. Lewis regarding same (.25); communicate with new claimant and provide claim form to claimant (.25); communicate with States representative regarding providing list of claimants organized by State and obtain list from paralegal (.50); investigate multitude of leads in database, including leads obtained from review of AMEX (2.50); conference with paralegals regarding a number of investor claims (.50).	4.25
05/27/2021	KMC Review list of claimants with highest claim amounts in each state and conference with paralegal regarding same (.25); conference with paralegal regarding non-metals claims (.25); conference with J. Rolls regarding Investors as witnesses (.25); conference with D. Dyer regarding fraudulent transfer claim against brokers and review Fifth Circuit opinion [REDACTED] (.75); telephone conference with K. Luquette (.25); research commissions paid to D. Bleeden and prepare chart of same (1.75); conference with A. Steinberg regarding review of AMEX statements (.25); conference with paralegal regarding certain claimants and status of claims (.50).	4.25
05/28/2021	KMC Conference to further research location of assets and gather information for claims against brokers (2.25); review AMEX charges with law clerk (.25); telephone conference with CFTC regarding status of S. Batashvili returning the monies he transferred in violation of the receivership orders (.50); research potential transfer of assets outside the United States (1.00).	4.00
06/01/2021	KMC Begin preparing Receiver's Claims Report (1.25); begin analysis of non-metals claims and conferences with paralegal and with J. Rolls regarding same (2.25); execute real estate contracts to sell two Philadelphia properties (.25); communicate with Investors regarding claims (.25); conference with P. Lewis regarding Forge Investment and having it transferred to receivership (.25).	4.25



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Kelly Crawford Receivership -- Metals.com

06/25/2021
 Account No: 16125-101
 Invoice No: 1023241

Matter 101 - Receiver

		Hours
06/02/2021	KMC Communicate with A. Spencer regarding consent to request for extension to file response to motion for show cause hearing against Simon Batashvili (.25); conference with CFTC regarding extension of time to respond to motion for show cause hearing (.25); review call notes of Investors with J. Rolls (.25); communicate with P. Lewis regarding having SpaceX Investment transferred to Receiver's name (.25); communicate with CrowdStreet entity regarding payments to receivership (.25); attend to investor inquiries and communicate with Investor (.25); begin preparing letter to CallTrackingMetrics (.75).	2.00
06/03/2021	KMC Complete letter to CallTrackingMetrics (.25); prepare letter to general counsel of Cadre regarding failure to respond to first demand letter and send to P. Lewis for review (.75); prepare and file Notice of No Objection to Motion for Appointment of Appraisers, etc. (.50); conference with Avi regarding brokers and their entities and addresses for same for including in Complaint for purposes of service (.50); review case law in California regarding fraudulent transfer claims and communicate with D. Dyer regarding same (.25); review Tower Equity PPM, Private Placement docs, Note, and Security Agreement (1.00); review Tower Investors and conference with Avi regarding review of Tower checks for payments to Tower Investors (.25); attend to claims (.25); communicate with broker regarding status of contracts, court hearing, and need to pay for repairs of Rhawn Street property and issue check for same (.25).	4.00
06/04/2021	KMC Conference with Avi regarding calculating commissions paid to each broker (.25); receive jewelry from A. Spencer delivery man, photograph same, and send email to A. Spencer regarding same (.25); work on analysis of non-metals claims (.50); review database for documents regarding offering made to Revo Investors and have binder of relevant documents prepared and prepare list of Revo Investors, amounts invested, and employees (1.25).	2.25
06/05/2021	KMC Work on receiver's recommendation for non-metals claims (.75); research banking transactions in Tower account (.25); review status of crowdstreet investment and communicate regarding distribution owing to Tower (.50); prepare third demand letter to Signature Bank demanding production of documents and communicate with P. Lewis regarding same (.50); communicate with P. Lewis regarding depositions to take and status of Simon's contempt (.25).	2.25
06/07/2021	KMC Conference with paralegal regarding non-metals claims and review non-metals claims (1.00); telephone conference with CFTC (.50); review production from Chris Dalgle regarding National Training Services and have bank documents reviewed (.75); have checks deposited into receivership account (.25); conference with D. Dyer regarding Complaint against brokers (.25); conference with Avi regarding calculating commissions paid to brokers (.25); communicate with P. Lewis regarding depositing [REDACTED] (.25).	3.25
06/08/2021	KMC Receive and review letter from investor Ted Wickstrom and respond (.25); attend to investor from Iowa who claims she did not receive claim form and communicate with Iowa regulators regarding same (.25); telephone conference with K. Luquette regarding production of database (.25); conference with J. Stafford regarding production of database (.25); telephone	

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Kelly Crawford Receivership – Metals.com

06/25/2021
 Account No: 16125-101
 Invoice No: 1023241

Matter 101 - Receiver

		Hours
	conference with CFTC regarding production of database (.25); review letter from attorney for MagicArrow and prepare responsive email and conference with P. Lewis regarding same (.50); conference with clerk regarding review of bank records as to investment made in National Training Services (.25); work on non-metals claims analysis and conference with J. Rolls regarding Linda Andersen claim (.75); work on creditor claims analysis and conference with paralegal regarding preparing chart of same (.75).	3.50
06/09/2021	KMC Telephone conference with former employee (.25); communicate with Rachel sending her list of claims received, organized by State (.25); conference with P. Lewis regarding strategy for [REDACTED] (.25); review database regarding [REDACTED] involvement with Defendants (.50); review excel spreadsheets and bank records regarding significant charges to AMEX claim by Fainche (.50); review bank records of National Training Services and send email to C. Daigle with questions regarding expenditures (.75); begin revising Complaint against Brokers (.50); investigate additional brokers and their receipt of monies for inclusion in Complaint (.75); work on obtaining additional information for completion of analysis of non-metal claims and communicate with various investors regarding claims (.50).	4.25
06/10/2021	KMC Contact Capital One about statements for accounts (.25); conference with J. Rolls regarding following up with JP Morgan Chase to get documents and review status of production by JP Morgan Chase (.50); communicate with J. Brandlin regarding additional accounts (.25); review Intuit and quickbooks (.50); attend to questions from claimants regarding claims (.50); review draft of Complaint against brokers and communicate with D. Dyer regarding same (.50); legal research regarding [REDACTED] and communicate with P. Lewis regarding same (1.00); communications with CFTC regarding monies received toward repayment of monies hidden in violation of the SRO by Simon Batashvili (.50).	4.00
06/11/2021	KMC Work on identifying bank records remaining to obtain and communicate with associate regarding making second demand upon Paypal and JPMorgan Chase for production of bank records (1.75); attend to claims and analyze non-metal claims (.100); review creditor claim filed by attorney for Perez Batashvili (.25);	3.00
06/14/2021	KMC Prepare initial draft of Reply to Defendant Simon's Response to Motion for Show Cause Hearing and legal research in support of same (3.00); telephone conference with CFTC and Peter Lewis (.50); attend to investor claims (.25); review response by defendant attorneys to motion to compel disclosure of retainer (.25); work on identifying status of bank record production and analysis (.50); communicate with CallTrackingMetrics regarding request for production (.25); communicate with Cadre regarding turnover of distributions (.25).	5.00
06/15/2021	KMC Telephone conference with CFTC and P. Lewis (.75); attend to claims and conference with team regarding deadline for claims (.75); begin work on reply to response to motion for show cause order to hold Defendant Simon Batashvili in contempt (1.25).	2.75

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Kelly Crawford Receivership -- Metals.com

06/25/2021
 Account No: 16125-101
 Invoice No: 1023241

Matter 101 - Receiver

		Hours
06/16/2021	KMC Revise, finalize, and file Reply to Defendant Simon Batashvili's Response to Motion for Show Cause Hearing for Contempt of Court and conference with P. Lewis regarding same (.300); prepare letter to MinnStar Bank following up with request for production of bank records (.50); prepare letter to General Counsel for Colibase enclosing receivership orders and making demand for production (.50); telephone conference with L. Sanderson and with JP Morgan Chase about production of bank records (.50);	4.50
06/17/2021	KMC Legal research for Reply to Defendant Attorneys' Response to Motion to Compel, conference with Priya regarding legal research, and prepare draft of Reply (4.50); telephone conference with JPMorgan Chase regarding production of bank records and provide requested information by email (.25).	4.75
06/18/2021	KMC Continue researching, preparing and finalizing Reply to Defendant Attorneys' Response to Motion to Compel and have filed with the Court (4.00); telephone conference with P. Lewis regarding Reply, CallTracking Metrics, and Fainche (.50); send Motion to Sell Two Additional Properties to Plaintiffs and counsel for Defendants for purposes of conferencing (.25).	4.75
06/21/2021	KMC Confirm deposit of monies in receivership account by Batashvili and communicate same with A. Spencer (.25); telephone conferences with CFTC regarding metals values and motion for authority to sell two additional properties (.50); conference with paralegal regarding claims process (.25); conference with P. Lewis regarding strategy with respect to Fainche, including fraudulent conveyance claims against her, and her refusal to turn over jewelry (.25).	1.25
06/22/2021	KMC Work on Receiver's Fourth Status Report (3.00); communicate with J. Stafford regarding making database available to the parties (.25); attend to unknown claim amount for investor and communicate with paralegal regarding same (.25); receive revised car registration for Mercedes and send to broker and lienholder (.25).	3.75
06/23/2021	KMC Work on Receiver's Fourth Report (2.50); prepare Receiver's Fourth Fee Application, Declaration, and Order (2.25 no charge); work on preparing database of documents for production to parties and communicate with J. Stafford regarding same (.50); telephone conference with CFTC (.50); finalize motion to sell two additional Philadelphia properties (.25); conference with J. Rolls regarding handling remaining investors who need to get metals from Bayside (.25).	4.00
06/24/2021	KMC Revise and finalize Receiver's Fourth Report (1.00); finalize Motion to Sell 2 additional properties and have filed with the Court (.25); telephone conference with tax accountants regarding information needed for filing tax returns and attend to providing the tax accountants with information (1.00); revise fourth fee application (.50 - no charge); conference with P. Lewis regarding [REDACTED] (.50); legal research regarding [REDACTED] (.50); prepare letter to counsel for parties waiving attorney client privilege of entities and have letter reviewed by P. Lewis (.50).	3.75
06/25/2021	KMC Prepare letter to escrow agent providing receivership orders and demanding	

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Kelly Crawford Receivership – Metals.com

06/25/2021

Account No: 16125-101
Invoice No: 1023241

Matter 101 - Receiver

production of documents (.50); prepare letter to East West bank regarding deposit of cashier's check found in defendants' records (.25); revise and finalize Receiver's Fourth Report and have filed with the Court (1.50); revise petition for payment of fees and send to CFTC for purposes of conferencing (1.50 - no charge); conference with J. Stafford regarding status of production of documents in database and revise and send email to parties regarding making documents available for review and inspection (.50); conference with P. Lewis regarding call with attorney for Forge regarding SpaceX liquidation (.25).

For Current Services Rendered

	Hours	
	3.00	
	82.75	<u>32,272.50</u>

Recapitulation

Timekeeper	Hours	Hourly Rate	Total
Kelly M. Crawford	82.75	\$390.00	<u>\$32,272.50</u>

Total Current Services and Expenses	32,272.50
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TERMS: Due and Payable Upon Receipt

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Scheef & Stone, L.L.P.
500 N. Akard, Suite 2700
Dallas, Texas 75201



INVOICE

Kelly Crawford Receivership ~ Metals.co

Statement Date: 07/25/2021
Account No. 16125.101
Invoice No. 1025146

Matter 101 - Receiver

		Hours
06/28/2021	KMC Check on status of bank records and bank records that are missing and communicate with accountant J. Brandlin regarding same (1.00); work on Claims Report (1.00); virtual meeting with J. Brandlin to review status of forensic accounting and bank records still needed and follow up after meeting to answer questions regarding account numbers (.75); communicate with broker regarding status of hearing to approve sale of properties (.10); telephone conference with escrow agent to confirm funds had been disbursed and escrow agent handled no other transactions for defendants (.15).	3.00
06/29/2021	KMC Review and execute documents required to open brokerage account to receive distribution of shares from EquityZen investments and send to broker (.50); receive and review metals valuations and conference with paralegal regarding same and confer with CFTC regarding same (.50); begin work on determining mailout to investors regarding claims report and logistics of same (.50); communicate with Pacific Premier Bank regarding bank document production (.25); receive and review CD regarding BOA bank record production, compare to previous production, identify missing documents and communicate with C. Thomas and J. Brandlin regarding same (1.25).	3.00
06/30/2021	KMC Telephone conference with CFTC, metals expert, and paralegal.	0.50
07/01/2021	KMC Conference with claims process team regarding preparing claims recommendations and preparing for mailout of claims (.50); telephone conference with P. Lewis regarding call with attorney for MagicStar Arrow and regarding Judge Lindsay orders (.50); prepare draft of advertisement for notice of sale of 6 properties in Philadelphia and communicate with J. Rolls regarding same (.50); communicate with Bayside Metals regarding processing metals orders for two investors (.50); conference with Avi regarding Equity Trust and communicate with J. Rolls regarding same (.25).	2.25
07/02/2021	KMC Review calculations of claims for certain metals investors and conference with paralegals regarding same (.50); work on analysis of non-metals claims and prepare letters to non-metal investors regarding claim recommendations	

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Kelly Crawford Receivership – Metals.com

07/25/2021
 Account No: 16125-101
 Invoice No: 1025146

Matter 101 - Receiver

			Hours
		(2.75); conference with P. Lewis regarding pending receivership issues and order from court regarding withdrawal of counsel (.25).	3.50
07/06/2021	KMC	Work on analysis of non-metals claims (2.00); work with A. Steinberg to review potential targets for recovery in disco system (1.00); execute extensions of three real estate contracts (.25); conference with P. Lewis regarding MagicStar Arrow (.25).	3.50
07/07/2021	KMC	Work on non-metals claim analysis (.50); telephone conference with CFTC regarding production of records (.25); communicate with CFTC regarding [REDACTED] [REDACTED] (1.25); communicate with third parties regarding review of documents (.25); review information discovered by Avi from search of database and conference with Avi regarding same (.50); review and execute addendum to sale contract to extend closing date for sale of Philadelphia property (.25).	2.00
07/08/2021	KMC	Communications with Bayside Metals regarding filling orders of Investors whose orders were frozen by receivership (.50); analyze investor claims for non-metals investments and confer with J. Rolls regarding same and communicate with accountant for investor regarding same (.75).	1.25
07/09/2021	KMC	Conference with J. Stafford regarding culling from database of documents those documents that may be privileged and provide J. Stafford with list of attorneys who may have represented Asher or Batashvili individually (.75); conference with CFTC regarding culling of documents for privilege prior to production (.25); communicate with paralegal and with CFTC regarding expert value of remaining coins for analysis of claims (.25); conference with accountants regarding assisting in obtaining bank records from Signature Bank and PayPal (.50); work on non-metals claim recommendations and chart to include in claims report (.50); revise Claims Report regarding non-metals claims (.75).	3.00
07/12/2021	KMC	Receive and review bank production from JP Morgan Chase and send to J. Brandlin for forensic accounting (1.00); receive and review bank production from Pacific Premier Bank and send to J. Brandlin for forensic accounting (.50); conference with claims team regarding status of calculations (.50); telephone conference with CFTC regarding production of documents and regarding claims process (.50); communicate with J. Stafford regarding document production (.25); start process for having bank records put on CD (.25); telephone conference with C. Koonce regarding background information for filing of lawsuit to recover commissions from brokers and send her draft of complaint against brokers (.75); conference with Avi regarding obtaining EIN numbers for entities added to receivership (.25); conference with J. Rolls regarding notice to be published in Philadelphia Inquirer for sale of properties and make payment for same (.25); communicate with Bayside Metals regarding instructions of customers regarding metals ordered but held in suspense pending the receivership (.25).	4.50
07/13/2021	KMC	Work on Claims Report and recommended treatment of claims (.75); communicate with metals expert regarding metal values (.25); receive document production from BOA and send to J. Brandlin and have put in	

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Kelly Crawford Receivership - Metals.com

07/25/2021
 Account No: 16125-101
 Invoice No: 1025146

Matter 101 - Receiver

		Hours
	searchable format for production (.75); conference with Avi Steinberg regarding purchases identified on bank records produced by BOA and commission payments to brokers (.25).	2.00
07/15/2021	KMC Work on Claims Report and analysis of creditor claims.	2.50
07/19/2021	KMC Telephone conference with E. Planer of Alabama Securities Department (.25); conference with P. Lewis regarding hearing on motion to compel (.25); conference with J. Rolls regarding obtaining bank documents from Signature Bank, obtain same, review production, and note deficiency (.50); review and revise consent decrees in Montana and Maryland and conference with J. Stafford regarding same (1.00); conference with paralegal regarding status of claims calculation and determination of claim in which investor previously settled with defendants (.50); work on preparing disc of bank records (.50); communicate with J. Brandlin regarding bank record production and revise status report of bank record production and provide status of accounting to R. Leazer (.50); conference with A. Steinberg regarding schedules of commissions paid to brokers to include in Complaint (.25).	3.75
07/21/2021	KMC Conference with Plaintiffs regarding review of records made available to the parties, regarding pending motions, and conference with Kelly regarding status of obtaining additional production of documents.	8.00
07/22/2021	KMC Prepare for hearing on Motion to Compel and conference with P. Lewis regarding same (.50); appear in court for hearing on Motion to Compel (.75); conference with Plaintiffs regarding Motion to Compel and status of other pending motions (.75); conference with Cynthia regarding metals claims analysis (.25).	2.25
07/23/2021	KMC Receive and review limited appearance of counsel for defendants and telephone conference with Plaintiff representatives regarding same (.50); review claims missing information and conference with paralegal regarding valuing claims at \$0 until additional information can be provided by investor (.50);	1.00
07/24/2021	KMC Review and analyze claims and work on claims report and appendix. For Current Services Rendered	3.75 49.75 19,402.50

Recapitulation				
Timekeeper	Hours	Hourly Rate	Total	
Kelly M. Crawford	49.75	\$390.00	\$19,402.50	

Total Current Services and Expenses	19,402.50
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Scheef & Stone, L.L.P.
500 N. Akard, Suite 2700
Dallas, Texas 75201



INVOICE

Kelly Crawford Receivership – Metals.co

Statement Date: 06/26/2021
Account No. 16125.102
Invoice No. 1023977

Matter 102 - Representation of Receiver

		Hours
05/26/2021	JLR Return the call of Investor Victim, B. Buiskool, regarding accidental deletion of Investor Confirmation information; Speak with C. Morris regarding the same and resending of documentation; Return call to IB. Buiskool notifying her of the resending.	0.25
	JLR Receipt and review of email correspondence from Investor Victim, M. Alexander, to provide attached documents/information to the Receivership as the Investor thought the attached could be helpful to the Receiver; Draft and send responsive email to the same.	0.25
	CAM Telephone call with Investor J. Troy to determine if he had valid a claim, document file accordingly, and email Receiver regarding same (.6); telephone calls and emails to and from various metals investors to resolve claim issues and document file accordingly (2.5); continue efforts on preparing claim calculation forms for metals investors (3); interoffice conference with team regarding investor calculation forms and other methods of streamlining process (.5).	6.60
	AS Review AmEx statements	3.50
	AE Review, revise, finalize, and process claims and send out claims to investors.	3.75
	PCL Communications with D. Baer, K. Crawford regarding offer on 29th Street and/or review of related offer documents (.25); communications with A. Bernstein and K. Crawford regarding D. Bleeden (.25).	0.50
05/27/2021	JLR Answer call from Investor Victim, M. Neeley, requesting status update as to Receivership; Draft and send subsequent email to the same providing written dates and information as discussed on the telephone call.	0.25
	JLR Interoffice conference with K. Crawford regarding specific Investor Victim individuals and calls.	0.25
	JLR Begin preparing list of names and details for agency regarding specific Investor victim individuals and calls	1.00
	AE Review, revise, finalize, and process claims and send out claims to investors.	3.50
	AS Review Amex statements	3.75



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Kelly Crawford Receivership –Metals.com

06/26/2021
 Account No: 16125-102
 Invoice No: 1023977

Matter 102 - Representation of Receiver

		Hours
CAM	Work on creating collection of metals investor claims from each state and organizing with claims from each state for Receiver, and editing and supplementing compiled list of non-metals claims (3.5); continue reaching out to investors who have questions or corrections on their metals claim (2.5).	6.00
DBD	continued attention to broker claims, including conference with receiver, computer research and reading case law.	1.20
PCL	Communications with K.Crawford regarding ██████████ used by Defendants and related file review.	0.40
05/28/2021	JSS Review Receiver's 3rd Status Report in preparation for drafting California Federal District Court status report.	0.50
	JSS Draft Receiver's Status Report in California Federal District Court in light of and in accordance with Texas Status Report.	1.00
	AS Review Amex statements	2.00
	AE Review, revise, finalize, and process claims and send out claims to investors.	6.00
	PCL Meet with K.Crawford, et al., to discuss case status and strategy for numerous issues.	2.50
06/01/2021	JLR Telephone call with Investor Victim, S. Hammerlund, regarding notes for Receiver K. Crawford.	0.50
	JLR Telephone call with Investor Victim, D. Burch, regarding notes for Receiver K. Crawford.	0.10
	JLR Telephone call with Investor Victim, P. Griffin, regarding notes for Receiver K. Crawford.	0.10
	JLR Telephone call with Investor Victim, S. Altman, regarding notes for Receiver K. Crawford.	0.10
	JLR Return telephone call with Investor Victim, P. Griffin, regarding notes for Receiver K. Crawford.	0.25
	JLR Locate Non-Metals Investor, L. Andersen, documents and claim form; Provide the same to K. Crawford for inclusion on the non-metals investor list.	0.25
	JLR Telephone call with Investor Victim, D. Burch, regarding notes for Receiver K. Crawford.	0.25
	JLR Telephone call with Investor Victim, P. Wray, regarding notes for Receiver K. Crawford.	0.25
	JLR Telephone call with Investor Victim, S. Weimer, regarding notes for Receiver K. Crawford.	0.10
	CAM Telephone calls to and from Investors regarding claim questions on metals as well as non-metals (2.5); continue working through the investor confirmation forms that had corrections (2); work on completing other Investors calculation forms (2).	6.50
	JLR Telephone call with Investor Victim, S. Altman, regarding notes for Receiver K. Crawford.	0.25
	JLR Continue to prepare list of specific Investor Victims and their respective notes requested by the Receiver K. Crawford.	0.50
	AS Cataloguing Amex statements on excel	3.00
	AE Review, revise, finalize, and process claims and send out claims to investors.	7.50

Kelly Crawford Receivership –Metals.com

06/26/2021
 Account No: 16125-102
 Invoice No: 1023977

Matter 102 - Representation of Receiver

			Hours
	AE	Review, revise, finalize and process claims and send out claims to investors.	5.00
06/02/2021	JLR	Complete list of specific Investor Victims and their respective notes requested by the Receiver. Provide the same to K. Crawford for review.	1.00
	JLR	Interoffice conference with C. Morris regarding issue with Investor Victim Couple, I. & B. Grubb, regarding Inadequate/unresponsive Investor Confirmation documentation; Address how to compute non-metal and metal investor claim value without cooperation by the same.	0.75
	JLR	Answer call from Investor Victim, M. Peden, requesting status update and claim value questions.	0.25
	JLR	Telephone call with Investor Victim Couple, R. & M., regarding their Non-Metal Investment and specific information needed by the Receiver, K. Crawford, as to their Investment payments and banking; Provide answers of same to K. Crawford.	0.50
	CAM	Telephone call with investor B. Grubbs regarding his non-metal and metal purchases and discuss what was needed on the metals side, as well as confirm several details on the non-metals side, and brief conference with J. Rolls regarding same.	0.60
	CAM	Telephone call with investor D. Mendenhall regarding metals and non-metals claim and detail incoming deposits; email to receiver regarding same.	0.50
	CAM	Receive and return various metals investor calls and note file regarding same.	2.00
	CAM	Continue generating claim calculation forms for metals investors.	3.50
	AE	Review, revise, finalize, and process claims and send out claims to investors.	2.50
	PCL	Communications with K.Crawford and A. Spencer regarding extension for Defendants reply(.2); communications with C. Park and K. Crawford regarding Space X liquidation issues and related file review(.6); review file regarding general case status(.3).	1.10
06/03/2021	JSS	Conference call with Forensic Expert regarding making database available to individual receivership defendants.	0.25
	JSS	Inter-office conference with Receiver regarding making database of documents available to Receivership Defendants.	0.25
	CAM	Telephone calls to and from various investors in connection with their metal claims (1); work out claims that have issues, including phone calls, emails and letters sent (2.5); continue creating investor claim calculation forms (3.5).	7.00
	PCL	Communications with D.Baer and K.Crawford regarding Maxim Electrical(.3);communications with K.Crawford regarding follow up Cadre letter and related review (.3); communications with K.Crawford regarding status of appraisal/motion to sell motions(.3); review A. Steinberg amex purchase analysis and related review (.6);communications with J.McClay regarding 19th contract and related review(.3).	1.80
	DBD	Continued prep of Complaint; emails and office conferences with legal assistant regarding locating addresses.	2.40

Kelly Crawford Receivership --Metals.com

06/26/2021
 Account No: 16125-102
 Invoice No: 1023977

Matter 102 - Representation of Receiver

06/04/2021	AE	Review, revise, finalize, and process claims and send out claims to investors.	4.50
	CAM	Telephone calls to and from investors to work out various claim issues (.3.5); revise non-metals spreadsheet and forward to Receiver (.5); continue preparing claim calculation forms for investors (3).	7.00
	DBD	Continued prep of Complaint.	0.80
	PCL	Communications with A. Spencer and K.Crawford regarding jewelry turnover status and related file review.	0.40
06/07/2021	JLR	Return call of Investor Victim, B. Revere, requesting status update as to her Barrick Capital Investment and Receivership claim; Draft and send subsequent email to B. Revere recapping the same as requested.	0.50
	JLR	Call to Non-Metals Investor Victim, L. Andersen, regarding the Receiver's questions as to her Revo, LLC Investment; Issues with contacting the same; Address with C. Morris.	0.25
	JLR	Return the call of Investor Victim, S. McCauley in response to his 6/6 email correspondence to K. Crawford regarding movement of Receivership funds.	0.50
	JSS	Telephone conference with forensic expert to assist with database preparation and tagging to present to Receivership Defendants.	0.25
	JSS	E-mail communications with Receiver and Co-Counsel regarding additional parameters regarding delivery of database to Receivership Defendants.	0.25
	AS	Research database to collect information about commissions paid to brokers.	5.50
	CAM	Work on non-metal claims spreadsheet, and contact several non-metal investors to obtain additional information needed by the receiver, updated the spreadsheet and sent emails to all non-metal claim holders confirming the information collected (2); continue working on metals claims and working with various investors on details and additional information that is needed and noting file regarding same (4).	6.00
	AE	Review, revise, finalize, and process claims and send out claims to investors.	2.00
	PCL	Communications with K. Crawford regarding Call Metrics demand and related review of documents (.50);communications with J. Schwartz and K.Crawford regarding P. Batashvili and related file review(.60)communications with A. Rule and K.Crawford regarding Call Metrics document request(.2); communications with J. Stafford and K. Crawford regarding database Issues(.2); communlcations with K. Crawford and/or S. Thomas regarding MagicStar and Cruz Issues and related document review(.6); communications with K. Crawford regarding F. McCarthy and related file review(.4).	2.50
	MKW	Legal research and memo law on disclosure of Ponzi schemes and violations of Securities law in PPMs used by Defendants.	1.50
	DBD	Continued attention to prep of Complaint; office conferences with Receiver and legal assistant	1.40
06/08/2021	JLR	Receipt and review of two voicemails left by Investor Victim, J. Raganswood, regarding confusion as to the claims process.	0.25
	AE	Review, revise, finalize, and process claims and send out claims to investors.	2.00
	JLR	Answer the call of Investor Victim, M. Strauss, requesting status update and tax questions.	0.25

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Matter 102 - Representation of Receiver

AS	Research database to collect information on commissions paid to brokers.	5.25
JLR	Interoffice Conference with K. Crawford regarding Investor Victim, L. Andersen's, question regarding the same's withdrawal payments regarding Non-Metals Investment.	0.25
KEW	Communications with J. Stafford regarding document production and review.	0.50
PKJ	Pull and begin reviewing cases that may support the Receiver's Motion to Compel defense counsel to reveal source of the retainer.	1.00
CAM	Work on claim calculation forms (3.5); receive and return phone calls from Investors who have not returned their claim forms and calculate their allowed claim amounts (2.5); revise non-metals spreadsheet (.5).	6.50
PCL	Communications with K. Crawford regarding B.Given/F.McCarthy response and related file review(.1.1); review communications regarding potential receivership defendant(.5); communications with J.Stafford and K. Crawford regarding database(.2).	
MKW	Legal research and memo drafting on [REDACTED]	0.50
DBD	Continued revisions to complaint.	1.00

06/09/2021	JLR	Telephone call with Investor Victim, L. Andersen, regarding questions as to Non-Metals Investment amount discrepancies; Provide answer to K. Crawford.	0.25
	JLR	Receipt and review of email correspondence and subsequent voicemail of Investor Victim, C. Foxpool, regarding returning the requisite Receivership documents; Telephone call with Investor Victim.	0.25
	JLR	Return the calls of Investor Victim, J. Raganswood, regarding confusion as to status of Receivership claims process.	0.10
	AE	Review, revise, finalize, and process claims and send out claims to investors.	2.50
	CAM	Receive and return numerous investor calls regarding the upcoming claims bar date and working through various claim issues (2.5); informal meeting with team members regarding the compiled list of received investor confirmation forms and how many are outstanding (.5); reviewing creditors' claim forms in preparation of compiling claims chart (.5); follow-up on non-metals creditors seeking additional information and documenting file regarding same (1.5); finalize claim calculation forms for several resolved metals claim issues (.5).	5.50
	PCL	Communications with K. Crawford and S. Thomas regarding Magic Star background and related file review(.4); communications with K Crawford regarding F.McCarthy amex charges and related file review (.5)	0.90
06/10/2021	AE	Review, revise, finalize, and process claims and send out claims to investors.	3.50
	MHS	Email from Receiver regarding contacting [REDACTED] regarding [REDACTED] (.1); contacting Belinchenco's attorney regarding same (.2); conference with Receiver regarding same (.1).	0.40

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	AS	Review database and gather information about commissions paid to brokers.	5.00
	CAM	Receive and return many phone calls from investors regarding their claim forms and related issues, as well as preparing claim forms for newly discovered investors (4.5); receive emails back from investors that requests were sent to and respond to same (1); prepare spreadsheet of all creditor claims and organize same (1.5).	6.00
	PKJ	Review cases in support of Receiver's Motion to Compel defense counsel to reveal source of retainer.	1.60
	JLR	Begin draft of Motion (Receiver's Motion Appointing Appraisers, Approving Appraisals, and Setting Hearing Regarding Approval of Sale of Certain Real Property) to Sell Two (2) Additional Philadelphia Properties; Locate and review of appraisals and sale contracts necessary to the drafting of same.	1.25
	JLR	Interoffice conference with K. Crawford regarding drafting of Letter to Chase Bank regarding request of documents not previously produced to the Receiver.	
	JLR	Receipt of and listen to Voicemail of Investor Victim, D. Burch, regarding confusion as to the Receivership claims process and status of his claim.	0.25
	JLR	Telephone call to Investor Victim, D. Burch, in response to his voicemail questions regarding his Receivership claim and its status.	0.25
	JLR	Return the call of Investor Victim, J. Raganswood, in response to several voicemails left by the same; Leave voicemail notifying her that the Receiver is returning her calls and questions as to status of her claim in the Receivership.	0.25
	KEW	DISCO document review for defendant production.	0.10
	JSS	Review database in DISCO with associate in preparation for production to parties in lawsuit.	2.50
	PCL	Communications with K.Crawford and S. Thomas regarding Magic Star issues and related file review and research(.8); communications with K.Crawford regarding title commitment issues(.2).	0.50
06/11/2021	JSS	Inter-office conference with associate regarding status on database review.	1.00
	JLR	Draft Letter to JPMorgan Chase Bank, N.A. regarding compliance with the previously served Receivership Orders seeking all banking records and documents of Receivership Defendants and Relief Defendant; Prepare corresponding Receivership Orders for enclosure with the same; Provide to K. Crawford for review.	2.00
	JLR	Continue drafting Receiver's Motion for Appointment of Appraisers, Approval of Appraisals of Certain Real Properties, and Setting Hearing regarding Approval of Sale as to two (2) Philadelphia Properties owned by Relief Defendant Tower Equity, LLC.	1.25
	MHS	Call to opposing counsel for Bellinchenko per request of Receiver.	0.20
	CAM	Receive and return numerous phone calls and emails from Investors regarding investor confirmation claim forms and assist with filling out the forms (4); work with several non-metals investors to complete the non-metals claim spreadsheet (1); work on preparing claim calculation forms (2).	7.00
	AE	Review, revise, finalize, and process claims and send out claims to investors.	1.75
	KEW	Review files on DISCO for production to parties in lawsuit.	1.75

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06/14/2021	JLR	Perform Westlaw case law research to support argument that the Receiver steps into the shoes of the Defendants as necessary for K. Crawford to draft email response to Call Tracking Metrics; Draft aforementioned string cite and provide to K. Crawford for review and use.	06/26/2021	2.50
	CAM	Receive and return numerous investor calls concerning the claim confirmation forms that are due on June 15th (4.5); finalize the creditors claims and updated spreadsheet (.5); continue work on solving problems with investors' claim forms and updating claim calculation worksheets (1.5).		6.50
	JLR	Complete draft of Receiver's Second Motion for Appointment of Appraisers, Approval of Appraisals of Certain Real Properties, and Setting Hearing Regarding Approval of Sale; Complete draft of respective Order granting the same; Prepare the Appendix to the aforementioned Motion.		0.75
	AE	Review, revise, finalize, and process claims and send out claims to Investors.		3.25
	KEW	DISCO document review and tagging for defendant production.		10.00
	PCL	Communications with K. Crawford, et al regarding Cadre information; review docket and outstanding motions.		2.00
06/15/2021	JLR	Continue preparation of the Appendix and corresponding exhibits (i.e. Sale Agreements and Appraisals) to the Receiver's Second Motion for Appointment of Appraisers, Approval of Appraisals of Certain Real Properties, and Setting Hearing Regarding Approval of Sale.	0.75	
	AS	Gather information from database regarding commissions paid to brokers.	6.00	
	CAM	Receive and return large volume of investor calls and emails concerning Investor Confirmation claim forms and assisting in getting them completed and returned by the end of the day deadline (5); work out many of the investor claim forms that required adjustments or amendments (2).	7.00	
	AE	Review, revise, finalize, and process claims and send out claims to investors.	4.00	
	KEW	Finalize DISCO document review for defendant production.	3.25	
	PKJ	Review Defendants' Response to Receiver's Motion for Show Cause Hearing to hold Batashvili in Civil Contempt and Receiver's Reply brief in support of Show Cause Motion for purpose of assisting with additional research in support of Reply brief.	0.75	
	PKJ	Research and review caselaw authority in support of the argument that once Receiver makes a prima facie case of showing a violation of the Receivership Order, the burden shifts to the Defendant to explain why he was unable to comply with the Receivership Order, and draft insert to be included in Receiver's Reply brief in support of show cause motion.	1.25	
	PKJ	Research and review caselaw authority in support of the argument that persons who fail to cooperate with a Court appointed Receiver can be held in civil contempt, and prepare insert to be included in Receiver's Reply brief in support of show cause motion.	2.50	
	PCL	Communications with K. Crawford, D. Baer, and J. Hamel regarding Philadelphia properties and related file review (.30) Communications with J. Buffet, R. Foelber and K. Crawford regarding outstanding motions, case status and related file review (1.6)	1.60	

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06/16/2021	JLR	Complete preparation of the Appendix and corresponding exhibits (i.e. Sale Agreements and Appraisals) to the Receiver's Second Motion for Appointment of Appraisers, Approval of Appraisals of Certain Real Properties, and Setting Hearing Regarding Approval of Sale; Provide the same to K. Crawford for final review.	1.25
	JLR	Answer call from Investor Victim, G. Acker, requesting a status update, however, later determined he never received nor completed required Investor Confirmation Form; Interoffice conference with C. Morris to confirm non-receipt and remedy to the same; Subsequent call to Investor Victim, G. Acker, to remedy moving forward as to his claim in the Receivership.	0.50
	JLR	Receipt of voicemail from Investor Victim, G. Acker, regarding non-receipt of emailed Investor Confirmation; Return the call of same to confirm proper receipt of Investor Confirmation to be completed.	0.25
	JLR	Interoffice conference with L. Thompson regarding timestamp issue as to Investor Victim, G. Acker's, late Investor Confirmation submission.	0.25
	CAM	Continue working out claim issues on investors' confirmation claim forms and preparing claim calculation forms (4.5); receive and return various phone calls and emails from investors to get investor confirmation forms in (2).	6.50
	JLR	Receipt of and listen to voicemail from Investor Victim, S. McCauley, regarding concerns as to his Investor Claim status forwarded by K. Crawford to respond to the same.	0.25
	PKJ	Review and analysis of cases cited by Defendants in Response to Receiver's Motion for Show Cause hearing to hold Batashvili in contempt of court for purpose of distinguishing same, and draft insert regarding same to be included in Receiver's Reply brief in support of motion for show cause hearing.	1.75
	PKJ	Review caselaw relating to the issue of non-parties being held in civil contempt of court for failing to comply with the receivership order per the request of P. Lewis.	1.00
	PCL	Communications with K. Crawford and related file review regarding outstanding motions, call metrics, et al strategy.	1.20
06/17/2021	JLR	Answer the call of Investor Victim, C. Harris, requesting status update regarding his and his wife's claims in the Receivership; Provide an update as to the same.	0.25
	JLR	Receipt of return voicemail from Financial Advisor, B. Scott, on behalf of an Investor Victim client who has yet to submit an Investor Confirmation; Confer with K. Crawford as to untimely filing of Investor Confirmations prior to return of same.	0.25
	JLR	Subsequent call with Financial Advisor of Investor Victim client, W. Heims, regarding late submission of Investor Confirmation; Draft and send email with copy of the to-be completed Investor Confirmation to the same.	0.25
	JLR	Return the call of Investor Victim, S. McCauley, regarding prior voicemail raising concern as to his Investor Confirmation.	0.25
	CAM	Receive and return many phone calls and emails regarding Investor Confirmation Claims (2); work on preparing claim calculation forms for investors (5).	7.00
	AS	Reviewed TMTE boxes and catalogued broker information.	3.25

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	PKJ	Review Receiver's Reply Brief in support of Motion to Compel Defendants' Attorneys to disclose the source of retainer; continue review and analysis of caselaw pertaining to the issue of whether attorney-client privilege serves as a legal basis for Defendants' Attorneys to protect the source of their retainer from being disclosed to the Receiver; draft insert to be included in Reply brief.	2.25
	PKJ	Research issue of whether Defendants' argument of possible risk of harassment of third-parties is a legal basis for not disclosing source of retainer for purpose of including favorable language in Receiver's Reply brief in support of Motion to Compel.	1.25
06/18/2021	CAM	Receive and return numerous emails and phone calls from investors and work out claim issues (2); continue preparing claim calculation forms for investors (3).	5.00
	AS	Reviewed boxes of documents from office of Simon Batashvili's and Lucas Asher's for possible leads on assets	3.00
	PKJ	Review and analysis of cases cited in FTC v. Assail to determine how the retainer information was obtained by the Receiver or government for purpose of incorporating case authority in support of arguments raised in Receiver's Reply in support of Motion to Compel.	1.60
	PCL	Review draft of Reply in Support of Motion to Compel and related communications with K. Crawford regarding same; communications with k. Crawford regarding SRO order provisions.	1.00
06/21/2021	CAM	Receive and return various phone calls from investors (1); continue preparing claim calculation forms (4).	5.00
	PKJ	Research issue of when are nonparties subject to a finding of civil contempt of court for failure to comply with a restraining order and what it means to be "in active concert or participation" with the defendants, for purpose of finding case authority in support of Receiver's position; confer with Peter Lewis regarding issues involved relating to nonparties and additional research to be conducted relating to same.	2.25
	PCL	Communications with K.Crawford regarding [REDACTED] and related research(.5); communications with A. Spencer and K. Crawford regarding Batashvili deposition(.2).	0.70
06/22/2021	CAM	Receive and return many phone calls and emails concerning claims and calculations of allowed values (2); continue preparing claim calculation forms (4).	6.00
	PKJ	Conduct additional research and review caselaw on the issue of whether non-parties can be held in contempt of court for failing to abide by the SRO/preliminary injunction order and what it means to be in privity with the defendants pursuant to Fed.R.Civ.P. 65(d). Rule 65(d).	2.50
	KEW	Conference with J. Stafford regarding review of DISCO document production; telephone conference with forensic expert regarding same; final review of tagged DISCO documents.	1.25
	PCL	Communications with A. Spencer regarding S. Batashvili deposition (.2);communications with J. Stafford and K. Crawford regarding database (.2).	0.40
	JSS	Review database production prepared by Katherine W. for production of documents to defendants	0.50

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06/23/2021	JLR	Answer call from Investor Victim, W. Eacker, regarding status update; Provide the same.	0.25
	JLR	Revise email correspondence regarding the Receiver's production of documents and access to Disco database to Plaintiff and respective counsel; Provide the same to J. Stafford for final review and service of the same.	0.50
	CAM	Continue contacting investors who have completed claim forms that need clarification (2); research DISCO e-discovery for metals.com to locate missing information for a numerous investor claims that have no back-up documentation (2); review IC form for R. Brown and draft letter for Receiver's signature to deny claim based on IC form received (.7); receive and return calls and emails from investors checking on the status of the case and their claims (1.5); continue creating claim calculation forms (1.5).	7.70
	JLR	Interoffice conference with L. Thompson regarding issue as to prepared Exhibits for the Receiver's Motion to Sell Two Additional Properties; Address the same.	0.25
	JLR	Interoffice conference with K. Crawford regarding review and subsequent contact of Investor Victims with pending metals at Bayside.	0.25
	LMS	Correspondence with Kelly Crawford regarding in-process transactions with Bayside Metals; Review notes to identify remaining unresolved accounts.	1.00
	PCL	Communications with J. Stafford, K., Crawford, regarding database(.2); communications with K. Crawford regarding Forge/C.Park communications and related file review.	0.50
	JSS	Review Disco database tagging done by K. Whitlock in preparation for production to Plaintiffs and Defendants.	2.00
	JSS	Draft proposed letter to Plaintiffs and Defendants regarding production of documents from Receiver's database.	0.50
	JSS	Telephone communication with Receiver's expert regarding production of documents to Plaintiffs/Defendants.	0.25
06/24/2021	CAM	Telephone calls to various investors to clarify claim information (1.2); research DISCO files for purchase documents on Investors who cannot locate their information (2.8).	4.00
	JLR	Answer the call of Investor Victim, P. Gilbert, regarding return of call for claim information; Provide to C. Morris.	0.25
	PKJ	Continued review and analysis of caselaw on the issue of what it means to be in privity with the defendants pursuant to Fed.R.Civ.P. 65(d) for purpose of finding nonparties in civil contempt of court for failure to comply with restraining orders or injunctions; draft email memo to Peter Lewis and Kelly Crawford regarding same.	1.50
	PCL	Review email regarding transmittal of Metals files to opposing counsel(.2); communications with K. Crawford and J. Stafford regarding Metals files(.2); communications with P. Jesani and K. Crawford regarding Injunction issues, review [REDACTED] and follow up communications to S. Thomas(.9); communications with B. Given regarding deposition of F. McCarthy(.2); communications with K. Crawford regarding privilege notice(.2); communications with K. Crawford, et al., regarding Metals pricing(.2).	1.90
	PKJ	Review and revise [REDACTED]	0.20

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Matter 102 - Representation of Receiver

06/25/2021	JSS	Review database ahead of production and communications with expert and Receiver regarding same.	0.50
	JSS	Edit production database set ahead of production of documents.	1.00
	JLR	Answer call from Investor Victim, C. Harris, regarding his and wife's respective Investor Claims; Provide to C. Morris.	0.25
	PCL	Communications with K.Crawford regarding Forge conference call with C.Park(.1), Zoom call with C. Park regarding Space X Investment(.4)follow up with K.Crawford regarding same(.2); communications with S. Thomas and K. Crawford regarding Magic Star document production request(.3); communications from B. Given regarding F. McCarthy deposition(.1); review draft fourth Receiver Report and related communications with K. Crawford(.4).	1.50
For Current Services Rendered			<hr/> 322.70 57,908.25



Scheef & Stone, L.L.P.
500 N. Akard, Suite 2700
Dallas, Texas 75201

INVOICE

Kelly Crawford Receivership – Metals.co

Statement Date: 07/26/2021
Account No. 16125.102
Invoice No. 1026638

Matter 102 - Representation of Receiver

DRAFT STATEMENT

			Hours
06/28/2021	JLR	Answer call from Investor Victim, D. Erickson, requesting status update as to June 15 Investor Claim; Answer the same.	0.25
	JLR	Return call to Investor Victim, D. Erickson, to confirm receipt of Investor Confirmation by extension date of June 15.	0.25
	JLR	Answer the call of Investor Victim, D. Burch, requesting status update and confusion as to his ability to sell his remaining metals as they are not subject to the Court's TRO.	0.25
	AS	Reviewing and cataloguing broker commissions on excel and word.	3.00
	AE	Review, revise, finalize, and process claims and send out claims to investors.	2.00
	PCL	Communications with D.Baer and K. Crawford regarding motion to sell status.	0.40
06/29/2021	JLR	Review and prepare contact information for Investor Victims with outstanding Bayside metals; Preparation for calling the same to transfer or liquidate the metals.	0.75
	JLR	Return the voicemail of Investor Victim, J. Raganswood, requesting status update as to her Investor Claim.	0.25
	JLR	Return the call of Investor Victim, D. Grady, regarding status update as to his Investor Claim and confusion as to his Entrust account; Provide the same to C. Morris.	0.50
	CAM	Review emails that came in over the weekend and respond to same (.5); telephone call with Investors regarding late claims to be submitted (.5); review additional material received from Investor C. Savello, discuss claim with Receiver, and finalize claim value (.5); review expert metal values Receiver obtained and go over additional questions expert has with respect to the metals (.5) discuss with team strategy to prepare for final round of claim calculation forms once expert values are placed on the claims (.5); begin work on inserting expert coin values into database (3.5).	6.00
	JLR	Receipt and review of email from Investor Victim couple, M. and K. Smith, detailing issues with Information flowing from the Entrust Group regarding their past and present Investment.	0.25
	AS	Reviewing and cataloguing broker commissions on excel and word.	3.00
	AE	Review, revise, finalize, and process claims and send out claims to investors.	2.00
	PCL	Communications with J. Stafford , D. Spitzer and K Crawford regarding status	

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Matter 102 - Representation of Receiver

		Hours
	reports received from D. Spitzer and related review(.4); communications with K.Crawford and A. Spencer regarding Batashvili deposition dates(.1);receipt of order setting hearing on motion to compel and related file review and communications with K. Crawford and J. Stafford(.5).	1.10
06/30/2021	JLR Review allegations alleged by Investor Victim Couple, K. and M. Smith, regarding Entrust Group; Provide the correspondence/allegations to K. Crawford for substantive answer to the same.	0.25
	JLR Draft and send email to Investor Victim, R. Houle, In lieu of telephone call (no telephone information found) detailing his pending Bayside metals and requesting action for the same.	0.25
	JLR Answer call from Investor Victim, D. Burch, regarding confusion as to Receivership claim and present metals with New Direction; Address the same.	0.25
	JLR Draft and send email to Investor Victim, P. Ordway, In lieu of telephone call (no telephone information found) detailing his pending Bayside metals and requesting action for the same.	0.25
	JLR Receipt of and listen to subsequent voicemail of Investor Victim, D. Burch, regarding conversation/confusion with New Direction and Receivership claim.	0.25
	JLR Telephone call to Investor Victim, G. Newsom, regarding his pending Bayside metals and requesting action for the same; Draft and send subsequent email to Investor Victim detailing the same.	0.25
	JLR Leave voicemail with Investor Victim, J. Schwab, regarding his pending Bayside metal and requesting action for the same; Draft and send subsequent email to the Investor Victim detailing the same.	0.25
	JLR Leave voicemail for Investor Victim, J. Kelly, regarding his pending Bayside metals and requesting action for the same; Draft and send subsequent email to the Investor Victim detailing the same.	0.25
	JLR Draft and send email to Investor Victim, L. Schwartz, In lieu of telephone call (no telephone information) detailing her pending Bayside metals and requesting action for same.	0.25
	CAM Review email from attorney for Investor D. RIng and respond to same; memo to file regarding same (.4); review defendants' records for missing information on a number of claims (2.5); review list of metal values received from expert and detail answers to various questions raised as well as comprising a list of questions for the expert as well (2.1); continue adding expert values to investor master database (2); teleconference with Receiver, J. Buffa and D. Samuelson (.5)	7.50
	JLR Telephone call to Investor Victim, W. Eacker, regarding his pending Bayside metals and requesting action for the same; Draft and send subsequent email to Investor Victim detailing the same.	0.50
	JLR Draft and send email to Investor Victim, S. Weston, In lieu of telephone call (bad telephone information) detailing his pending Bayside metals and requesting action for same.	0.25
	JLR Telephone call to Investor Victim, T. Doub, regarding his pending Bayside metals and requesting action for the same; Draft and send subsequent email to Investor Victim detailing the same.	0.25
	JLR Receipt and review of email from Investor Victim, G. Newsom, providing written instruction as to his Bayside metals; Draft and send responsive email to the same.	0.25
	JLR Receipt and listen to subsequent return voicemails from Investor Victim, J. Raganswood, requesting update as to status of Investor Claim and Claim Report.	0.25

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Kelly Crawford Receivership – Metals.com

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Matter 102 - Representation of Receiver

		Hours
JSS	E-mail communication with Receiver and Counsel for Defendant regarding transmission of production.	0.25
JSS	Communication with co-counsel P. Lewis regarding review of status reports filed in California matter relating to Receivership Defendant entities.	0.25
PCL	Communications with K. Crawford, J. Buffa, et al., regarding metals issues.	0.60
07/01/2021	JLR Interoffice correspondence with K. Crawford regarding email correspondence from Investor Victim Couple, M. & K. Smith, regarding allegations related to Entrust Group and subsequent review by K. Crawford of the same.	0.25
	JLR Receipt and review of email from Investor Victim, J. Schwab, providing written instruction as to his Bayside metals; Draft and send responsive email to the same.	0.25
	JLR Receipt of voicemail from Investor Victim, G. Scott, requesting return call as to his Receivership Claim; Attempt to leave voicemail; Draft and send subsequent email confirming receipt of voicemail but inability to return call to bad telephone number.	0.25
	CAM Receive and return phone calls and emails from investors (.5); team meeting regarding upcoming claims deadlines (.5); begin inserting expert metal values into investor value database for Investors 1-499 (5); update non-metals database (.5).	6.50
	JLR Telephone call with Investor Victim, G. Scott, to provide status update as to the Receivership and explain the upcoming Claims Report.	0.50
	JLR Receipt of voicemail from Investor Victim, R. Rhyne, requesting status update and confusion as to the new timeline of the Claims Report; Return call.	0.25
	JLR Answer call from Investor Victim, M. Strauss, to explain no need for Receiver approval to liquidate metals at Direct Trust IRA; Provide status update regarding the same.	0.50
	JLR Receipt of voicemail from Investor Victim, W. Eacker, in response to my request for written instruction as to his pending Bayside metals; Attempt to leave voicemail (voicemail full); Draft and send responsive email detailing the same.	0.25
	JLR Answer call from Investor Victim, R. Houle; Explain the Receiver's request for written instruction as to his pending Bayside metals; R. Houle will follow-up with his decision.	0.50
	PCL Communications with K. Crawford and J. Stafford regarding D. Spitzer status filings and related review of same-(.6); communications with K. Crawford regarding rulings on motion to withdraw and related review of rulings(.5).	1.10
07/02/2021	JLR Receipt of responsive voicemail from Investor Victim, R. Rhyne, regarding prior telephone call; Return call and provide status update and answer questions as to the Claims Report.	0.50
	JLR Draft and send subsequent email to Investor Victim, R. Houle, providing the requested pending Bayside metals information and again explaining the Receiver's request for written instruction as to the same.	0.25
	JLR Draft and send subsequent email to Investor Victim, W. Eacker, providing the requested pending Bayside metals information and again explaining the Receiver's request for written instruction as to the same.	0.25
	JLR Answer return call from Investor Victim, W. Eacker, to discuss he and his wife's decision as to the pending Bayside metals and explain that the same must be put into writing and sent to the Receiver	0.50
	JLR Receipt of voicemail from Investor Victim, R. Kolbow, regarding status update as to the Receivership; Return call.	0.25

Kelly Crawford Receivership – Metals.com

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Matter 102 - Representation of Receiver

			Hours
	CAM	Meet with team on metal values and strategize for preparing Claims Report (.5); continue working on putting expert metal values into database (3.5).	4.00
07/06/2021	ABS	Discuss with Kelly Crawford case status and upcoming hearing regarding motion to compel and need for research regarding receivership case law (.3)	0.30
	CAM	Review emails and phone calls received from Investors over the weekend (.5); draft letter to Investors in anticipation of sending out claim calculation forms along with the Receiver's Claims Report and forward to Receiver with additional comments (1); generate merged labels for all Investors (.5); finish second batch of claim calculations for claims 500-899 (5).	7.00
	JLR	Receipt of responsive email from K. Crawford regarding the Receivership's inability to comply with Investor Victim, W. Eacker's, specific funds request as to his pending Bayside Metals; Draft and send email to Investor Victim, W. Eacker, informing him of the same and requesting revised written instructions as to the pending Bayside metals.	0.75
	JLR	Receipt and listen to voicemail from N. Jones regarding my prior voicemail as to her husband Investor Victim, R. Jones, pending Bayside metals.	0.25
	JLR	Receipt and listen to of voicemail from wife of Investor Victim, J. Kelly, regarding my prior voicemail as to her husband's pending Bayside metals and detailing her power of attorney status.	0.25
	JLR	Receipt and review of email from Investor Victim, L. Minehart, requesting status update as to his Receivership claim.	0.25
	AS	Reviewed DIsco for leads on tower equity financial dealings.	3.50
	PCL	Communications with K. Crawford regarding [REDACTED]	0.40
07/07/2021	JLR	Draft and send responsive email to Investor Victim, M. Radney, providing her with the current court-ordered Receivership timeline and status update.	0.25
	JLR	Return the call of Investor Victim, N. Jones, regarding her husband Investor Victim, R. Jones, pending Bayside metals.	0.25
	JLR	Answer return call from Investor Victim, S. Kelly, regarding her husband's pending Bayside metals and power of attorney as to the requested written instructions; Confirm power of attorney with K. Crawford; Resend email to Investor Victim detailing the same.	0.75
	JLR	Receipt and review of email from Investor Victim, M. Radney, regarding my prior status email and her continued confusion; Draft and send responsive email notifying her that she can always call the Receivership to address questions or concerns.	0.25
	ABS	Research case law regarding attorney's obligation to provide information about the source of a retainer to a receiver (2); discussion with Kelly Crawford regarding subordination of claims and status of claims report (.2)	2.20
	JLR	Answer call from Investor Victim, M. Peden, requesting status update as to his claim in the Receivership.	0.25
	CAM	Receive and return phone calls from investors regarding status of the case (1); work on adding expert metal values in to database 900-1750 (6).	6.00
	AS	Continued reviewed of DIsco for leads on tower equity financial dealings.	2.75
	JLR	Receipt and review of email correspondence from Investor Victim, J. Kelly, providing written instruction as to his pending Bayside metals; Provide the same to K. Crawford.	0.25
	PCL	Communications with E. Planner, K.Crawford, D. Stoumbos, R. Foelber, et al., regarding document review and 7/22/21 hearing attendance(.4); communications with K.Crawford, R.Foelber, J. Buffa regarding various counsel for defendants(.3); communications with K. Crawford regarding	

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Matter 102 - Representation of Receiver

		Hours
	Motion to Compel research(.6);communications with J.McClay and K. Crawford regarding E. Penn property offer.(3).	1.60
07/08/2021	JLR Receipt and listen to of voicemail from G. Hayes requesting status update as to his Mother Investor Victim, J. Hayes', Receivership claim.	0.25
	JLR Return the call of G. Hayes to provide Receivership status update as to his Mother, J. Hayes, claim; Draft and send subsequent email providing the same.	0.50
	JLR Receipt and review of email regarding Investor Victim, A. Bell, regarding unauthorized IRA and Receivership claim.	0.25
	JSS Telephone conference with IT expert regarding questions Receiver received from CFTC regarding documents produced.	0.25
	JSS Draft and send Receiver answers to CFTC regarding documents Receiver produced.	0.50
	JLR Return telephone call of Investor Victim Couple, J. & A. Bell, regarding several questions and concerns as to their respective Receivership claims, Entrust accounts, and Receivership Status; Send subsequent email recapping the same; Confirm with C. Morris regarding issue as to J. Bell's Receivership claim.	1.75
	JLR Return the call of Investor Victim, S. Kelly, regarding her husband's pending Bayside metals; Confirmed receipt of the written instruction and inquired as to receipt of email from K. Crawford; Leave voicemail.	0.25
	JLR Receipt and review of email correspondence from Investor Victim, R. Houle, providing written instruction as to his pending Bayside metals; Provide to K. Crawford.	0.25
	JLR Draft and send responsive email to Investor Victim, R. Houle, confirming receipt of pending Bayside metals instructions and answering his question/confusion as to the discrepancy in his original investment price and estimated investment price.	0.25
	JLR Receipt and review of email correspondence from Investor Victim, T. Doub, providing written instructions as to his pending Bayside metals; Provide to K. Crawford.	0.25
	JLR Draft and send responsive email to Investor Victim, T. Doub, confirming receipt of his written instructions for his pending Bayside metals and altering him to a future correspondence from K. Crawford regarding the same.	0.25
	JLR Draft Notice of Sale and Hearing as to the six (6) Philadelphia, PA properties as required by 28 USC Section 2001.	0.50
	JLR Contact Philadelphia Inquirer regarding a quote to run July weekend Notice of Sale and Hearing as to the sale of the 6 Philadelphia, PA real properties.	0.25
	ABS Update case law for equity receivership distribution and subordination of creditors to Fifth Circuit (1.5)	1.50
	CAM Finalize the expert metal values into the last spreadsheet of Investor claims (6.5).	6.50
	JLR Interoffice conference with K. Crawford regarding discrepancies in Investor Victim, L. Andersen's, Non-Metal Investment Information; Review email correspondence from K. Crawford regarding the same.	0.25
07/09/2021	JLR Receipt of and listen to voicemail from Investor Victim, R. Reisner, requesting status update.	0.25
	JLR Draft and send subsequent email to Investor Victim, L. Andersen, notifying her that I am unable to reach her by telephone and need to speak with her regarding her Tower investment and the monies paid from the same as the information is necessary for computation of her Non-Metal claim.	0.25

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Matter 102 - Representation of Receiver

		Hours
JLR	Return the call of Investor Victim, R. Reisner, to provide a requested status update as to her claim in the Receivership; Draft and send subsequent email to R. Reisner recapping the same for her records/reminder.	0.50
JLR	Responsive telephone call to Investor Victim, N. Jones, regarding her husband's pending Bayside metals.	0.25
JLR	Draft and send follow-up email to Investor Victim, P. Ordway, regarding request for written instructions as to pending Bayside metals.	0.25
JLR	Draft and send follow-up email to Investor Victim, S. Weston, regarding request for written instructions as to pending Bayside metals.	0.25
JLR	Draft and send follow-up email to Investor Victim, L. Schwartz, regarding request for written instructions as to pending Bayside metals.	0.25
JLR	Interoffice conference with K. Crawford regarding review of the Notice of Sale and Hearing as to the six (6) Philadelphia Properties to confirm addresses and sales prices and to contact the Philadelphia Inquirer regarding to run for 7/16 weekend.	0.25
JSS	Inter-office conference with Receiver regarding privileged documents review.	0.25
JSS	Inter-office conference and e-mail to K. Whitlock regarding assignment to search, tag and review privileged documents;	0.25
JLR	Telephone call to Investor Victim, S. Gaw, requesting written instructions as to his pending Bayside metals; Draft and send subsequent email requesting the same.	0.25
JLR	Telephone call to Investor Victim, K. Miller, requesting written instructions as to her pending Bayside metals; Draft and send subsequent email requesting the same.	0.25
JLR	Telephone call to Investor Victim, S. Quandt, requesting written instructions as to his pending Bayside metals; Draft and send subsequent email requesting the same.	0.25
JLR	Return call to Investor Victim, R. Houle, altering him to the email correspondence from Bayside metals trying to reach him to confirm a shipping address for his Bayside metals; Leave voicemail.	0.25
JLR	Receipt and review of email correspondence from Investor Victim, S. Quandt, providing written instructions as to his pending Bayside metals; Provide to K. Crawford; Draft and send responsive email to S. Quandt confirming receipt.	0.25
JLR	Telephone call to Investor Victim, L. and P. Simpson, requesting written instructions as to their pending Bayside metals; Unable to leave voicemail (bad number).	0.25
JLR	Contact the Philadelphia Inquirer Legal Notice Department regarding the quote for and timeframe of the Notice of Sale and Hearing as to the six (6) Philadelphia real properties; Draft and send subsequent email to the same with the attached word document.	0.25
JLR	Answer telephone call from Investor Victim, S. Gaw, regarding request for written instruction as to his pending Bayside metals; Answer questions as to the Receivership generally.	0.75
JLR	Answer call from Investor Victim, S. Quandt, to address confusion as to next steps in receipt/delivery of pending Bayside metals.	0.50
JLR	Receipt and review of email correspondence from Investor Victim, S. Gaw, providing written instructions as to his pending Bayside metals; Provide to K. Crawford.	0.25
JLR	Telephone call with Investor Victim, L. Andersen, to discuss the deviations in Tower Investment payments received; Draft and send summary of the same to K. Crawford.	0.25
CAM	Receive and return two Investor calls (.2); prepare memo to file regarding	0.50

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Matter 102 - Representation of Receiver

		Hours
	Investor (.3); coordinate with team on strategy on finalizing claims (.5); go over the database values again and identify the last remaining coin values needed and email to Receiver regarding same (2); research DISCO to locate missing claim information for many Investors (2); work out claim issues for various investors (1).	6.00
AS	Reviewed broker information on Disco to form database of victims of brokers on excel.	5.50
KEW	Conference with J. Stafford regarding new production of documents; review DISCO database for new production set.	2.25
07/12/2021	JLR Receipt and review of email correspondence from Investor Victim, W. Eacker, providing his written instructions as to his pending Bayside metals; Provide to K. Crawford.	0.25
	JLR Draft and send responsive email correspondence to Investor Victim, W. Eacker, confirming receipt of his written instructions as to his pending Bayside metals and altering him to shipment email from Bayside.	0.25
	JLR Answer call from Investor Victim, G. Dunphy, to address confusion regarding his Investor Confirmation and claim in the Receivership; Provide status update.	0.75
	JLR Receipt and review of responsive email correspondence from contact, M. Lafrance, of the Philadelphia Inquirer regarding publication and quote of the Legal Notice as to the six (6) Philly properties; Draft and send email response back confirming receipt of same.	0.25
	JLR Answer call from Investor Victim, C. Snyder, requesting status update; Draft and send subsequent email to the same providing summary timeline for her records and ease of understanding upcoming actions and deadlines.	0.25
	JLR Answer call from Investor Victim, B. Revere, requesting status update and update as to her percent recovery on her Receivership claim.	0.25
	JLR Return the voicemails of Investor, S. Quandt, regarding his pending Bayside metals; Leave voicemail notifying Investor of the metals status in transit.	0.25
	JLR Telephone call with the Legal Notice Department of the Philadelphia Inquirer to discuss payment of the quoted Legal Notice of Sale and Hearing as to the six (6) Philly Properties.	0.50
	JLR Telephone call with the advertising department of the Philadelphia Inquirer to confirm the correct payment address of the Legal Notice of Sale and Hearing for the six (6) Philly properties; Notify K. Crawford of the confirmation.	0.50
	JSS Review new production of documents for CFTC prepared by K. Whitlock.	0.75
	JSS Inter-office conference with K. Whitlock and expert regarding production of documents to CFTC.	0.50
	JSS Confer with Receiver regarding production of documents to CFTC.	0.50
	AS Found Simon and Asher's entities' EIN numbers and reviewed Chase Bank statements.	3.25
	KEW Review DISCO database for new production set; conference with J. Stafford regarding new production.	1.25
	CAM Go through database of all metals and expert values for quality check (2); review short list of coin values still needed (.5); work on finalizing claim calculation forms (4).	6.50
	PCL Communications with J. Stafford, K. Crawford, J. Buffa and A. Asci regarding FTP site(.3); communications with K. Crawford, D. Baer, J. Hammel regarding 178 Rosemar (.2); communications with K. Crawford, R. Foelber, J. Buffa, regarding claims calculation format(.3).	0.80

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			Hours
07/13/2021	JLR	Draft and send email to Investor Victim, G. Dunphy, attempting to contact him subsequent to our call to inform him that the Receiver has not received his completed Investor Confirmation.	0.25
	JLR	Draft and send correspondence to Legal Notice Department of Philadelphia Inquirer confirming receipt of payment for Legal Notice of Sale and Hearing as to (6) Philly Properties.	0.25
	JLR	Receipt and review of subsequent email from Legal Notice Department of the Philadelphia Inquirer providing an update as to no receipt of the payment for the Legal Notice of the Sale and Hearing of the six (6) Philly Properties; Draft and send responsive email to the same.	0.25
	JLR	Return the call of potential Investor Victim, L. Duka, regarding participation in the Receivership; Unable to leave voicemail.	0.25
	CAM	Continue preparing final calculation forms for claims report.	4.50
	AS	Work on compiling Brokers' wire transfers.	4.25
	PCL	Communications with J. Stafford and A. Asci regarding document transfer.	0.20
	PCL	Communications with J. Stafford regarding FTP site.	0.40
07/14/2021	JLR	Receipt and review of email correspondence from Investor Victim, K. Miller, responsive to my previous pending Bayside metals request for written instruction; draft and send responsive email to Investor Victim, K. Miller, regarding confusion as to her pending Bayside metals; Provide the specific metals presently pending at Bayside.	0.50
	JLR	Receipt and review of email correspondence from Investor Victim, J. Lindenmuth, regarding status update and notice as to obtaining a metals broker; draft and send responsive email to Investor Victim, J. Lindenmuth, providing responsive Receivership status update and timeline; Address metals broker issue for sale of remaining metals as outside the scope of the Receivership.	0.50
	JLR	Receipt and review of subsequent email from Legal Notice Department of the Philadelphia Inquirer confirming no further action and receipt of a copy of the Legal Notice for the Receiver's records; Draft and send responsive email to the same.	0.25
	JLR	Receipt of and listen to voicemail from Investor Victim, J. Gearhart, requesting status update as to the Receivership; receipt and review of subsequent email correspondence from Investor Victim, J. Gearhart, regarding request for Receivership status update and confusion as to receipt of the Claim Report; Draft and send responsive email to the same providing a timeline of upcoming Receivership actions and deadlines.	0.50
	ABS	Update case law section in receivership report pertaining to subordination of claims and send to Kelly Crawford for review (2.5)	2.50
	JSS	Review and revise Montana's proposed Consent Order.	0.50
	AS	Research and compile list of brokers' wire transfers.	3.00
	JLR	Return the call of Investor Victim, J. Raganswood, to provide requested status update as to her Receivership claim	0.50
	CAM	Receive and respond to email from metal expert on last metal value needed (.2); telephone call with Investor P. Foley regarding claim and adjust claim values as appropriate and finalize claim calculation form and document via memo to file (.8); continue working on finalizing investor claim calculation forms (6.5).	7.50
	JSS	Review and revise Maryland consent order.	0.50
07/15/2021	JLR	Review Bayside Metals correspondences to locate/confirm transmittal of	

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Matter 102 - Representation of Receiver

		Hours
	Investor, S. Gaw's, written instructions as to his pending Bayside metals; Confirm with K. Crawford regarding the same.	0.25
JSS	Review and respond to email from CFTC regarding verification of uploaded documents	0.25
JLR	Draft and send responsive email to Investor Victim, S. Gaw, regarding his confusion as to images attached in Receivership correspondences and his request for payment advancement against his Receivership Claim; Confer with C. Morris regarding status of S. Gaw's untimely claim and advancement; Forward the same to C. Morris for further review.	0.50
AS	Worked on reports of broker commissions.	2.50
CAM	Continue preparing claim calculation forms for investors, including reaching out to many investors with incomplete information (7).	7.00
AE	Work on obtaining missing information for claims to complete calculation.	3.50
PCL	Communications with J Stafford and C. Cajigal regarding document delivery.	0.30
07/16/2021	CAM Continue preparing claim calculation forms including reaching out to investors who have incomplete information to prepare calculations (6).	6.00
	PCL Review pleadings and outstanding motions and begin preparation for motion to compel hearing next week.	0.80
	PCL Communications with D. Baer, K. Crawford, J. Hammel regarding status of court order on motion to sell properties.	0.30
07/19/2021	JLR Receipt and review of email correspondence from Legal Notice contact of the Philadelphia Inquirer providing attached copy of Legal Notice of Hearing and Sale of the six (6) Philly properties; Draft and send responsive email to the same; Provide to K. Crawford for Receivership records.	0.25
	JLR Receipt and review of internal email correspondence from L. Sanderson regarding request from Investor Victim, W. Eacker, to return his calls regarding Wells Fargo.	0.25
	JLR Return the call of Investor Victim, W. Eacker, regarding his Wells Fargo check used in the purchase of his Metals.com Order.	0.50
	JLR Receipt of and listen to voicemail from Counsel of Signature Bank, M. Scheiner, regarding non-compliance with multiple requests for account opening documents, statements, copies of checks, wires, and deposits.	0.25
	JLR Research as to claim alleged by Investor Victim, W. Eacker, as to Chase Metals worker E. Schwartz; Inform K. Crawford of the same.	0.50
	JLR Answer return call from Assistant General Counsel of Signature Bank, M. Scheiner, regarding document request; Draft and send subsequent email to the same needed for confirmation of anticipated date of production.	0.50
	JLR Receipt and review of internal email from K. Crawford regarding missing documentation from the received document production of Signature Bank.	0.25
	JLR Receipt and review of email correspondence from K. Baboolal of Signature Bank providing Secure Share files; Draft and send responsive email to the same confirming receipt.	0.25
	JLR Draft and send email correspondence to Counsel for Signature Bank, M. Scheiner, requesting production of missing deposit record.	0.25
	JLR Receipt and review of email correspondence from Counsel of Signature Bank, M. Scheiner, detailing responsive document production update.	0.25
	CAM Continue preparing claim calculation forms for investors (7); telephone call with Investor regarding status (.2); research DISCO for information on Ellsa Schwartz (.3).	7.50
	JLR Receipt and review of responsive email correspondence from Counsel for	

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		Hours
	Signature Bank, M. Scheiner, confirming receipt of the Receiver's request for production of missing deposit records.	0.25
AE	Review, revise, finalize, and process claims and send out claims to Investors.	7.50
PCL	Communications with K.Crawford and B.Given regarding F. McCarthy jewelry and/or Amex purchase Issues and upcoming motion to compel hearing(.8); communications with K.Crawford and D.Baer regarding Wannamaker property (.2).	1.00
07/20/2021	JLR Draft and send responsive email correspondence to Counsel for Signature Bank, M. Schelner, confirming receipt of his prior email correspondence regarding the Receiver's request for production of missing deposit records.	0.25
	JLR Answer telephone call from Investor Victim, I. Taggart, requesting status update and confusion as to autonomy over remaining metals; Draft and send recap email correspondence to the same.	0.50
	JLR Receipt and review of email correspondence from Investor Victim, S. Gaw, regarding the confirmation of his claim in the Receivership and the source of his future recovery; draft and send responsive email to Investor Victim, S. Gaw, confirming claim in the Receivership and detailing the source of his future recovery; Confer with C. Morris to confirm S. Gaw's claim in the Receivership by way of Investor Confirmation and/or Bayside pending metals; Confirm the same with K. Crawford.	0.50
	JLR Receipt and review of email correspondence from Signature Bank, K. Baboolal, providing Secure Share contribution files to supplement the original 7/19 document production; Draft and send responsive email confirming receipt of the same.	0.25
	JLR Receipt and review of subsequent email correspondence from Signature Bank, K. Baboolal, providing the password necessary to access the supplementation of responsive documentation on Secure Share; Draft and send responsive email to the same confirming receipt.	0.25
	JLR Prepare and send K. Crawford a PDF of Signature Bank supplemental document production as to the missing deposit records.	0.25
	JLR Interoffice correspondence with K. Crawford and C. Morris regarding confirmation of receipt of Investor Victim, S. Gaw's, completed Investor Confirmation; Confirmed missing.	0.25
	JLR Draft and send responsive email to Investor Victim, S. Gaw, providing the attached Investor Confirmation and detailing submission date necessary to be considered as having a Receivership claim.	0.25
	JLR Leave responsive voicemail with Investor Victim, S. Gaw, detailing his need to submit a completed Investor Confirmation necessary to secure his claim in the Receivership.	0.25
	JLR Answer return call from Investor Victim, S. Gaw, explaining the need for his completion and return of his Investor Confirmation and address his shipment question regarding his Bayside metals currently in transit.	0.50
	JLR Receipt of and listen to voicemail from Investor Victim, S. Gaw, regarding Issues with tracking of Bayside metals and Investor Confirmation Exhibit A.	0.25
	JLR Receipt and review of email correspondence from Investor Victim, S. Gaw, regarding Issues/confusion with submitting completed Investor Confirmation and tracking Information as to in transit Bayside Metals.	0.25
	JLR Return the call of Investor Victim, S. Gaw, addressing tracking Information Issues with Bayside metals and submission of Investor Confirmation.	0.75
AS	Worked on broker commission totals and double-check mailing lists for the brokers.	8.00

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		Hours
CAM	Continue preparing claim calculation forms for investors, including communications with investors who lacked information necessary to complete.	6.50
JLR	Receipt and review of email correspondence from Investor Victim, S. Gaw, providing attached completed Investor Confirmation. Forward to C. Morris for claim analysis.	0.25
JLR	Draft and send subsequent email correspondence to Investor Victim, S. Gaw, confirming receipt of his completed Investor Confirmation and addressing Bayside metals tracking information email response; Leave voicemail.	0.25
AE	Review, revise, finalize, and process claims and send out claims to investors.	3.00
JLR	Receipt and review of email correspondence from Investor Victim, S. Gaw, detailing the fax of his completed Investor Confirmation.	0.25
PCL	Review of pleadings and file materials in connection with motion to compel hearing and begin related preparation.	1.10
07/21/2021	JLR Draft and send responsive email to Investor Victim, S. Gaw, confirming receipt of his completed Investor Confirmation and provide updated timeline of Receivership.	0.25
JLR	Receipt and review of email correspondence regarding Investor Victim, S. Kraft, requesting confirmation of receipt of Investor Confirmation and status update.	0.25
JLR	Receipt of and listen to voicemail from Investor Victim, B. Revere, requesting status update as to the Receivership and percentage of claim recovery.	0.25
JLR	Return the call of Investor Victim, B. Revere, to provide status update and answer as to percent recovery.	0.25
JLR	Return the call of Investor Victim, S. Kraft, to provide status update and confirm receipt of completed Investor Confirmation; Confirm receipt of Investor Confirmation in Receivership database.	0.25
JLR	Draft and send subsequent email to Investor Victim, S. Kraft, to outline the the Receivership dates/deadlines as discussed during our telephone call.	0.25
JLR	Answer call from Investor Victim, S. Kelly, regarding receipt of her husband, J. Kelly's, Bayside metals and questions as to Receiver claim status.	0.25
JLR	Draft and send subsequent email to Investor Victim, S. Kelly, outlining the Receiver claim process as discussed during the telephone call for her understanding and records.	0.25
JLR	Answer call from Investor Victim, J. Dunphy, regarding confusion as to Direct Trust company and documentation support necessary for his untimely Investor Confirmation claim; Address the same with C. Morris as to processing the same's late claim.	0.75
JLR	Interoffice conference with K. Crawford regarding the preparing of three (3) Notices of Stay in Commonwealth of Kentucky	0.25
AS	Worked on mailing lists and envelopes for the received.	8.00
WSY	Confer with Peter Lewis regarding need for powerpoint presentation in support of Motion to Compel discovery into the source of Defendants' retainer funds (.4); Review relevant pleadings for relevant background of the matter (.8); Draft PowerPoint Presentation addressing all issues identified in Peter's outline (2.5); Review Peter's revisions to the PowerPoint and Insert the same for his review (1.1).	4.80
CAM	Complete claim calculation forms, including working with investors and searching databases for missing information (7.5).	7.50
PCL	Communications with K. B. Kugler, J. Buffa, et al., regarding receivership issues and status(2.0); review pleadings and file materials, prepare presentation for motion to compel hearing tomorrow and related	

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			Hours
		communications with K.Crawford, W. Young , et al., regarding same (3.9).	5.90
07/22/2021	JLR	Review of Investor Confirmation and supporting documentation attached thereto for Investor Victim, J. Raganswood, necessary to computing claim value; Confer with C. Morris regarding issues as to the same.	1.00
	JLR	Receipt and review of internal email correspondence regarding Investor Victim, A. Bell, regarding confusion as to Improper IRA created with Equity and status of Receiver.	0.25
	JLR	Telephone call with Investor Victim, A. Bell, to address her questions as to Equity Trust IRA and Receivers status update.	0.50
	JLR	Draft and send subsequent email to Investor Victim, A. Bell, summarizing our prior telephone call and providing Receivership timeline for her understanding and records.	0.25
	JLR	Receipt of and listen to voicemail of Investor Victim, M. Gutho, requesting confirmation of receipt of Investor Confirmation.	0.25
	JLR	Research to confirm receipt of Investor Victim, M. Gutho, completed Investor Confirmation; Confirmed.	0.25
	JLR	Return the call of Investor Victim, M. Gutho, to notify him of receipt of timely completed Investor Confirmation.	0.25
	JLR	Draft and send subsequent email to Investor Victim, M. Gutho, providing summary of Receivership timeline for his understanding and records.	0.25
	JLR	Receipt of and listen to voicemail from Investor Victim, A. Thomason, requesting tax advice as to her Receivership claim.	0.25
	JLR	Return the call of Investor Victim, A. Thomason, requesting tax advice as to her Receivership claim; Leave voicemail.	0.25
	JLR	Draft and send subsequent email to Investor Victim, A. Thomason, notifying her that we received her voicemail and are attempting to contact her to answer her tax questions.	0.25
	JLR	Receipt of and listen to voicemail from Investor Victim, D. Burch, requesting status update and issue as to New Direction.	0.25
	JLR	Return the call of Investor Victim, D. Burch, to answer his questions regarding Receivership status and New Direction.	0.25
	JLR	Receipt of and listen to voicemail from Investor Victim, R. Adamczak, requesting status update as to the Receivership.	0.25
	JLR	Return the call of Investor Victim, R. Adamczak, to provide status update as to the Receivership and address question as authority to sell/mail/change custodian of remaining metals.	0.25
	CAM	Continue preparing claim calculation forms, including working with investors and searching databases for missing information (7.5).	7.50
	WSY	Continue revision of PowerPoint presentation in support of Motion to Compel at Peter Lewis' direction (1.2); travel to and participate in hearing on Motion to Compel before Judge Toliver and debrief concerning the same afterward (2).	3.20
	PCL	Prepare for and attend hearing on motion to compel Brantley Arant and Quinn Emanuel (4.0); related communications with J. Buffa, K. Crawford regarding hearing today and related issues (2.5).	6.50
	PCL	Review Monex ruling summary (.4) communications with J. Stafford and C. Cajcal regarding discovery documents (.2)	0.60
07/23/2021	JLR	Receipt of and listen to voicemail from Investor Victim, B. Mitchell, requesting Receivership status update.	0.25
	JLR	Receipt of and listen to voicemail from Investor Victim, A. Thomason, regarding confusion as to tax questions for her Receivership claim.	0.25

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Kelly Crawford Receivership - Metals.com

07/26/2021
 Account No: 16125-102
 Invoice No: 1026638

Matter 102 - Representation of Receiver

		Hours
JLR	Return the call of Investor Victim, B. Mitchell, regarding request for status update; Unable to leave voicemail.	0.25
JLR	Draft and send subsequent email to Investor Victim, B. Mitchell, notifying him that his voicemail is inoperative and providing current Receivership timeline as to his status update request.	0.25
JLR	Return the call of Investor Victim, A. Thomason, regarding her request for a tax questions as to her Receivership claim.	0.25
JLR	Review provided pleading in Bill Cravens and Mary Linda Cravens v. TMTE Inc, D/B/A Metals.com et al. necessary for preparing Notice of Receivership and Related Stay.	0.25
JLR	Telephone call to the District Clerk of the Commonwealth of Kentucky Bullitt Circuit Court regarding procedures for filing Notice of Receivership and Related Stay in Bill Cravens and Mary Linda Cravens v. TMTE Inc, D/B/A Metals.com et al.	0.25
JLR	Draft Notice of Receivership and Related Stay in Bill Cravens and Mary Linda Cravens v. TMTE Inc, D/B/A Metals.com et al. for the Commonwealth of Kentucky Bullitt Circuit Court.	1.25
PCL	Review G. Besen and L. Devaney retainer source letters and/or notice of proposed substitution co and related communications with K. Crawford, et al., regarding same and notice of substitution.	0.90
CAM	Continue working on claim calculation forms, including revisions, research, phone calls/emails, etc. to accurately complete claim calculation forms.	7.50
07/24/2021	CAM Continue generating claim calculation forms and doing quality check.	6.00
07/25/2021	CAM Continue working on claim calculation forms and updating claims value databases.	4.50
	For Current Services Rendered	<u>291.75</u>
		<u>50,515.00</u>

Recapitulation

Timekeeper	Hours	Hourly Rate	Total
Walker S. Young	8.00	\$265.00	\$2,120.00
A. Becca Skupin	6.50	265.00	1,722.50
Jessica L. Rolls	52.25	225.00	11,756.25
Cynthia A. Morris	128.00	125.00	16,000.00
James Stafford	4.75	400.00	1,900.00
Katherine Whitlock	3.50	200.00	700.00
Alicia Echavarria	18.00	125.00	2,250.00
Peter Lewis	24.00	440.00	10,560.00
Avi Steinberg	46.75	75.00	3,506.25

06/29/2021	Overnight Delivery (1) Federal Express	23.88
07/02/2021	GOOGLE SUITE Subscription (BKC Firm CC)	252.00
07/06/2021	Microsoft - Monthly Subscription (BKC Firm CC)	250.00
07/12/2021	Overnight Delivery (1) Federal Express	29.32
	Total Expenses	<u>555.20</u>

Kelly Crawford Receivership --Metals.com

06/26/2021

Account No:

16125-102

Invoice No:

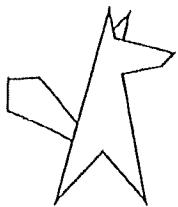
1023977

Matter 102 - Representation of Receiver

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
David B. Dyer	6.80	\$475.00	\$3,230.00
Priya K. Jesani	21.40	300.00	6,420.00
Mark Simon	0.60	435.00	261.00
Leslie Sanderson	1.00	320.00	320.00
Jessica L. Rolls	24.35	225.00	5,478.75
Morgan K. Weaver	2.00	175.00	350.00
Cynthia A. Morris	125.40	125.00	15,675.00
James Stafford	8.00	400.00	3,200.00
Katherine Whitlock	19.25	200.00	3,850.00
Alicia Echavarria	51.75	125.00	6,468.75
Peter Lewis	21.90	440.00	9,636.00
Avl Stelnberg	40.25	75.00	3,018.75

04/26/2021	Airfare Expense - flight to LAX for KMC/ AMERICAN AIRLINES (KMC Firm CC)	421.80
04/26/2021	Airfare Expense - flight to LAX for PCL/ AMERICAN AIRLINES (KMC Firm CC)	421.80
04/28/2021	Business meals - Per Diem/ \$66.00 x 2 people	132.00
04/29/2021	Lodging Expenses - ANDAZ W HOLLYWOOD - PCL (KMC Firm CC)	357.28
04/29/2021	Lodging Expenses - ANDAZ W HOLLYWOOD HYATT - KMC (KMC Firm CC)	357.28
04/29/2021	Business meals - Per Diem \$66.00 x 2 people	132.00
04/29/2021	Rental car - HERTZ (KMC Firm CC)	186.76
04/30/2021	Parking Expense -DFW Airport Parking (KMC Firm CC)	48.00
05/26/2021	Postage	0.51
05/26/2021	Postage	0.51
06/01/2021	Postage	1.02
06/02/2021	Storage - Google Suite (BKC Firm CC)	252.00
06/03/2021	4 Overnight Deliveries (1) Federal Express	155.50
06/03/2021	Postage	1.02
06/04/2021	Postage	0.51
06/04/2021	Postage	0.51
06/08/2021	Microsoft Subscription / MICROSOFT (BKC Firm CC)	100.00
06/10/2021	Microsoft Subscription / MICROSOFT (BKC Firm CC)	150.00
06/11/2021	4 Overnight Deliveries (1) Federal Express	134.99
06/14/2021	3 Overnight Deliveries (1) Federal Express	176.44
06/16/2021	Computerized legal research	1,778.70
06/25/2021	2 Overnight Deliveries (1) Federal Express	71.77
	Total Expenses	4,880.40
	Total Current Services and Expenses	62,788.65



Brown Fox PLLC
8111 Preston Road, Suite 300
Dallas, Texas 75225
Phone: (214) 327-5000
Fax: (214) 327-5001

INVOICE

Invoice # 25957
Date: 07/12/2021

Kelly Crawford
Receiver
Scheef & Stone
500 North Akard Street, Suite 2700
Dallas, Texas 75201

Statement of Account

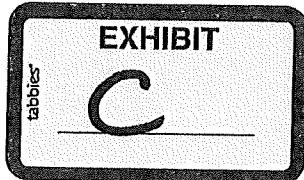
Metals.com and Barrick Capital Receivership

Services

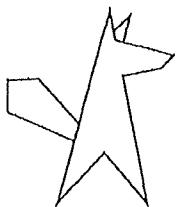
Date	Initials	Description	Hours	Rate	Total
06/01/2021	CCT	Correspondence with K. Crawford regarding status of motion to show cause.	0.10	\$405.00	\$40.50
06/28/2021	CCT	Correspondence with Receiver regarding documents previously requested from BOA; correspondence with counsel to BOA regarding same.	0.30	\$405.00	\$121.50
			Quantity Subtotal	0.4	
			Services Subtotal	\$162.00	

Expenses

Date	Description	Total
03/23/2021	Hand delivery charges to Kelly Crawford, Scheef & Stone.	\$22.57
Expenses Subtotal		\$22.57



APP00036



Brown Fox PLLC
 8111 Preston Road, Suite 300
 Dallas, Texas 75225
 Phone: (214) 327-5000
 Fax: (214) 327-5001

INVOICE

Invoice # 26409
 Date: 08/10/2021

Kelly Crawford
 Receiver
 Scheef & Stone
 500 North Akard Street, Suite 2700
 Dallas, Texas 75201

Statement of Account

Metals.com and Barrick Capital Receivership

Date	Initials	Description	Hours	Rate	Total
07/02/2021	CCT	Correspondence with counsel to BOA regarding additional missing records.	0.10	\$405.00	\$40.50
07/08/2021	CCT	Follow-up correspondence with counsel to BOA regarding missing records; correspondence with Receiver regarding same.	0.20	\$405.00	\$81.00
07/13/2021	CCT	Correspondence with Receiver regarding additional documents provided by Bank of America.	0.10	\$405.00	\$40.50
			Quantity	Subtotal	0.4
				Subtotal	\$162.00

Kelly Crawford v. Walter Vera , et al.

Date	Initials	Description	Hours	Rate	Total
07/12/2021	CCK	Telephone conference with K. Crawford regarding facts giving rise to receivership and claims against brokers, questions and concerns regarding broker	0.60	\$425.00	\$255.00

claims and evaluating same.

07/15/2021	CCK	Review CFTC Complaint, Receivership Order and Receiver's Initial Report; review draft complaint against brokers provided by Mr. Crawford; research regarding [REDACTED] [REDACTED]; telephone conference with K. Crawford regarding questions regarding strategy and factual allegations; begin substantial edits to draft complaint.	4.50	\$425.00	\$1,912.50
07/30/2021	CCK	Continue review of draft Complaint against Brokers, research regarding [REDACTED] [REDACTED] [REDACTED] continue drafting/revising same.	1.60	\$425.00	\$680.00
			Quantity	Subtotal	6.7
			Subtotal		\$2,847.50

Hours Total	7.1
Subtotal	\$3,009.50
Total	\$3,009.50

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. COMMODITY FUTURES TRADING
COMMISSION, *et al.*

Plaintiffs,

v.

TMTE, INC. a/Ida METALS.COM, CHASE
METALS, INC., CHASE METALS, LLC,
BARRICK CAPITAL, INC., LUCAS THOMAS
ERB a/Ida LUCAS ASHER a/Ida LUKE ASHER,
and SIMON BATASHVILI,

Defendants,

TOWER EQUITY, LLC,

Relief Defendant.

§§§§§
CIVIL ACTION NO.
3:20-CV-2910-L

§§§§§

DECLARATION OF RECEIVER KELLY M. CRAWFORD

My name is Kelly M. Crawford, I am over 18 years of age, have never been convicted of any crime involving moral turpitude and I am fully competent to make this Declaration.

1. I am the Receiver appointed by this Court by an *Order Granting Plaintiffs' Emergency Ex Parte Motion for Statutory Restraining Order, Appointment of Receiver, and Other Equitable Relief* (the "SRO") entered on September 22, 2020 in the case styled above and I have personal knowledge of each of the facts stated below.

2. I reviewed the invoice from Scheef & Stone, LLP for the legal fees billed for the period from May 26, 2021 through July 25, 2021. I wrote off more than \$40,000 of time that I believed should not be billed to the receivership estate. Specifically, the original invoice I received

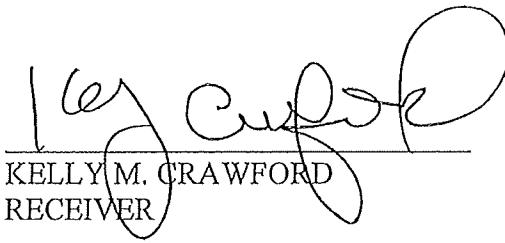


from Scheef & Stone, LLP totaled \$138,600 in fees. In exercising my billing judgment, I wrote off \$30,176.75 of legal fees to arrive at the total \$108,423.25, which I then discounted by 15%. I primarily wrote off time of associate attorney Jessica Rolls who has been returning calls from investors and assisting investors with the claims process. I also wrote off more time of the paralegals who worked on inputting information in the database of investor information, preparing claims to mail to the investors, analyzing claims received from investors, and communicating with investors.

3. Of the discounted fees¹ of \$92,159.76 billed by Scheef & Stone, LLP, \$48,984 of the fees were attributable to obtaining information from investors for the claims process, conferring with investors, analyzing the claims received from the investors, assisting me with my Claims Report, and assisting investors with pending metals orders obtain their metals or liquidation value from Bayside Metals.

4. I declare under penalty of perjury that the foregoing is true and correct and is within my personal knowledge.

Dated: September 10, 2021



KELLY M. CRAWFORD
RECEIVER

¹ After I reduced the final invoice by 15%.